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7116 '99 SEP 10 P1:54

DOCKETS MANAGEMENT BRANCH (HFA-305)
FOOD AND DRUG ADMINISTRATION
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket numbers:
98N-1230
96P-0418
97P-0197

To Whom It May Concern:

Each year the United States Egg industry force molts (intentionally starves for up to 14 days) millions of hens to manipulate egg production.

Forced molting is so stressful it destroys the hens' immune system, predisposing the birds and their eggs to salmonella infection. The US Department of Agriculture's Food Safety & Inspection Service (FSIS) stated:

"FSIS recognizes that public health concerns are raised by highly stressful

forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of Salmonella enteritidis

(Se) by laying hens subjected to these practices."

The FDA has jurisdiction to ban farm practices that injure human health. Therefore, the FDA should ban the practice of forced molting because it has been scientifically shown to promote disease by destroying

the starving hens' immune system. Forced molting of laying hens is the

primary cause of infectious diseases in hens, eggs, and consumers of eggs.

The FDA was petitioned in April 1998 to ban forced molting. This petition

should be granted without further delay. Putting Bacteria warning labels on

egg cartons and regulating refrigeration temperatures is not enough to ensure human safety.

Sincerely, *Monte V. Gullo*
Monte V. Gullo
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HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION
CROSS REFERENCE SHEET

Docket Number/Item Code: 98N-1230/C514

See Docket Number/Item Code: 97P-0197/C515
96P-0418/C514

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